



IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA,)
)
VS.) CASE NO.: 3:22 CR-327
) JUDGE FRENSEY
JAMES ZASTROW,)
DEFENDANT.)

UNOPPOSED MOTION TO ALLOW OUT OF DISTRICT OF TRAVEL

Comes now the Defendant, **James (Jim) Zastrow**, by and through undersigned counsel, and hereby moves this Court for permission to travel outside is current district of supervision, for the purposes of supporting his family in Calvin Zastrow's surrender to the Bureau of Prison.

As grounds, the Defendant would show a bench trial was conducted before this Honorable Court on one misdemeanor count of violation of the FACE Act. The bench trial was conducted on April 2, 2024, and the Defendant was found guilty on the same date. Sentence was imposed on July 30, 2024, and the judgment order was entered on August 22, 2024. (D.E. 722) The Defendant received a sentence of three years probation, and was ordered to serve three months on home detention. (Id.) the Defendant is currently on electronic monitoring. The Defendant has been in continuous compliance with all the terms and conditions of his Federal supervision since imposition of his sentence. He continues to reside in Versailles City, Morgan County, Missouri, wherein he has lived through out the entirety of this cause. He is currently on supervision with the United States Probation Office.

Further, Mr. Zastrow would show his father, Calvin Zastrow, was a co-defendant in this cause. His father was convicted of a felony offense before a jury, Judge Aleta Trauger presiding. The senior Mr. Zastrow was ordered to serve a period of confinement, and is scheduled to self-report on Tuesday, October 15, 2024, around 2:00 pm. The Defendant desires to be present and supportive of his father when Calvin Zastrow surrenders to serve the sentence imposed. The Defendant would travel by vehicle on the date of surrender and plans on meeting his mother and other family members at the place of surrender. He has made arrangements to leave his residence around 6:00 am, and travel continuously to Thomson Federal Penitentiary located at 1100 One Mile Road, Thomson, IL 61286. The Defendant would return on the same date in question, arriving at his home address, at approximately at 8:00 pm, Missouri time.

Counsel for the Defendant has contacted AUSA Nani Gilkerson regarding the request made in this motion. The government has advised that it is not opposed to the Defendant's travel outside of his district of supervision for the herein stated purpose, and the date requested.

WHEREUPON the Defendant James Zastrow respectfully request permission to travel outside his district of supervision on the date of October, 15, 2024.

Respectfully submitted,

s/ Rayburn McGowan Jr.

Rayburn McGowan Jr. (#17476)
Counsel for Defendant **Zastrow**
8005 Church Street East
Suite 219
Brentwood, TN 37027

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Sentencing Memorandum has been delivered by the Court's ECF system to **Ms. Nani Gilkerson**, AUSA, 791 Church Street, Suite 330, Nashville, TN 37203, and **Mr. Kyle Boynton**, AUSA, 950 Pennsylvania Ave., NW, Washington, D.C. 20530, and other counsel of record on this the 14th day of October, 2024.

s/ **Rayburn McGowan Jr.**

Rayburn McGowan Jr.